

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Laura E. Hansen Thomas R. Hansen JPMorgan Chase Bank, N.A. vs. Laura E. Hansen Thomas R. Hansen William C. Miller Esq.	<u>Debtors</u> <u>Trustee</u>	CHAPTER 13 NO. 13-20525 AMC 11 U.S.C. Section 362
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STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Moving Party on the Debtor's residence is **\$4,752.35**, which breaks down as follows;

Post-Petition Payments:	August 2016 through December 2016 at \$998.63
Less Suspense Balance:	(\$240.80)
Total Post-Petition Arrears	\$4,752.35

2. The Debtors shall cure said arrearages in the following manner;

a). Beginning January 2017 and continuing through June 2017, until the arrearages are cured, Debtors shall pay the present regular monthly payment of **\$998.63** on the mortgage (or as adjusted pursuant to the terms of the mortgage) on or before the first (1st) day of each month (with late charges being assessed after the 15th of the month), plus an installment payment of **\$792.05** towards the arrearages on or before the last day of each month at the address below;

JPMorgan Chase Bank, N.A.
3415 Vision Drive
Mail Code: OH4-7142
Columbus, OH 43219

b). Maintenance of current monthly mortgage payments to the Moving Party thereafter.

3. Should debtors provide sufficient proof of payments (front & back copies of cancelled checks and/or money orders) made, but not credited, Movant shall adjust the account accordingly.

4. In the event the payments under Section 2 above are not tendered pursuant to the terms of this stipulation, the Moving Party shall notify Debtors and Debtor's attorney of the default in writing and the

Debtors may cure said default within FIFTEEN (15) days of the date of said notice. If Debtors should fail to cure the default within fifteen (15) days, the Moving Party may file a Certification of Default with the Court and the Court shall enter an Order granting the Moving Party relief from the automatic stay.

5. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.

6. If the case is converted to Chapter 7, the Moving Party shall file a Certification of Default with the court and the court shall enter an order⁷ granting the Moving party relief from the automatic stay.

7. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

8. The provisions of this stipulation do not constitute a waiver by the Moving Party of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

9. The parties agree that a facsimile signature shall be considered an original signature.

Date:

By: /s/Brian C. Nicholas, Esquire

Brian C. Nicholas, Esquire

Thomas Puleo, Esquire

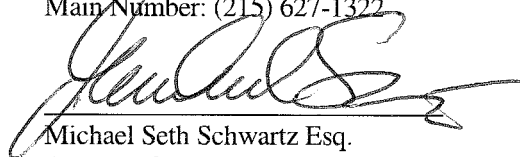
Attorneys for Movant

KML Law Group, P.C.

Main Number: (215) 627-1322

Date:

1-16-17



Michael Seth Schwartz Esq.

Attorney for Debtors

Approved by the Court this ____ day of _____, 2017. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge

Ashely M. Chan